

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
FINAL POLLUTION REPORT**

**DATE:** October 3, 2003

**SUBJECT:** Flat Creek Oil Discharge  
(aka BP Oil)  
7102 Hwy 70 South  
Nashville, Davidson County, Tennessee

**FROM:** Steve Spurlin, OSC  
USEPA Region 4

**TO:** S. Hitchcock, EPA  
Region 4, RRC

**I. BACKGROUND**

FPN#:	None assigned to date
SITE ID#:	None assigned to date
PROJECT CEILING:	\$ 0
LEAD AGENCY:	EPA, Region 4, ERRB 61 Forsyth Street, SW Atlanta, Georgia 30303
NPL:	No
FUNDING:	OPA
LEAD OSC:	Steve Spurlin

**II SITUATION**

Date of Notification:	13 SEP 02
Date Action Started:	11 SEP 02
Pollutant:	Gasoline
Quantity Discharged:	Approximately 500 gallons
Source Identification:	Ongoing or past gasoline release from underground storage tank

**III ACTIONS TAKEN**

OSC Spurlin responded to the release on September 13, 2002. The release was initially reported via the National Response Center (NRC#622833) as a gas seep entering Flat creek. According to the report, the seep had been discovered in August 2002, and had recently increased in volume. Odor complaints were reported by a nearby apartment complex.

Upon arriving on-scene, OSC Spurlin observed a petroleum sheen on Flat creek which appeared to be emanating from the culvert and embankment near the point where Flat creek went under the roadway. Representatives from CDM consultants and the Ferguson Harbor(FH) cleanup company were on-scene. CDM and FH had been retained by the BP Oil company to investigate the source of the release and to take mitigative actions in the creek to attempt to collect any released product. BP Oil was not admitting responsibility, but owned the gas station closest to the seep. FH had deployed absorbent booms and pads into Flat Creek to recover gasoline discharging to the water.

Since the exact source of the spill could not be determined immediately, the OSC issued Notice of Federal Interest letters to both BP Oil and Exxon Tiger Mart, the two closest potential sources. While on-scene, the OSC was informed by CDM that the problem had been ongoing for several weeks, but recently worsened, possible due to changes in the water table. CDM indicated that the Tennessee Department of Environment & Conservation (TDEC) was aware of the problem. The OSC contacted TDEC's UST program, who sent a representative to the scene on September 13<sup>th</sup>. Ms. Debbie Mann of TDEC's UST program arrived on-scene. EPA, TDEC, and BP's consultants discussed the situation. Since the release appeared to be UST related, it was decided that the TDEC UST program would take the lead on the project. After obtaining assurances from BP that the creek would continued to be monitored, the OSC departed the scene.

The OSC talked periodically with BP's consultant over the next 1-2 weeks to ensure that appropriate actions continued to address any release to the creek.

#### **IV FUTURE ACTIONS**

EPA ERRB does not anticipate any further involvement with the site. The TDEC UST program has indicated they are requiring BP to undertake a sampling investigation and remediation, as necessary.

#### **V ESTIMATED COSTS**

EPA	\$500 (no travel)
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